



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

E-MAILED: NOVEMBER 16, 2012

November 16, 2012

Mr. Nathan Perez, Associate Planner, nperez@cityofperris.org
Planning Division
City of Perris
135 North "D" Street
Perris, CA 92570-2200

Final Environmental Impact Report (Final EIR) for the Proposed Stratford Ranch Industrial Project (SCH. NO. 2012011037)

The South Coast Air Quality Management District (AQMD) staff submitted comments in a letter dated September 14, 2012 regarding the Draft EIR for the proposed project. The lead agency responded to those comments in the Final EIR dated October 8, 2012. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final CEQA document when formally adopted by the lead agency.

The AQMD staff recognizes the lead agency's inclusion of mitigation measures proposed in our comment letter directed to reduce significant project long-term operational mobile-source emissions. The AQMD staff still has concerns, however, that although health effects to nearby sensitive receptors were determined to be less than significant, all feasible mitigation measures should be considered to reduce operational NOx impacts that were also determined to be significant by the lead agency. Further, AQMD staff does not agree with the lead agency's determination that state regulations are the only means to reduce trucking emissions at a project level. The lead agency has the discretion to require or incentivize cleaner truck technologies as a condition of the project in order to minimize significant NOx emissions.

Finally, the AQMD notes that the lead agency analyzed air quality impacts and health effects based on trip generation rates from the 8th Edition of the Institute of Transportation Engineers (ITE) Report using a non-default truck trip rate 1.44 per thousand square of gross floor area (Land Use Code 152 – High-Cube Warehouse). The lead agency further commented in its response (Comment G-8, page 5) that using the higher trip rate (2.59 per 1,000 square feet as described in the CalEEMod User Guide) is not warranted. AQMD staff notes that revisions in the recently published 9th Edition ITE Trip Generation Report include a higher trip rate of 1.68 per 1,000 square feet recommended for Land Use Code 152 – High-Cube Warehouse. The AQMD staff therefore believes the non-default trip 1.44 rate used in the Draft EIR air quality analyses is lower than it should be for a reasonable worst-case CEQA analysis and that the trip rate

Mr. Nathan Perez,
Associate Planner

2

November 16, 2012

should be revised in applicable analyses in the Final EIR. This should be done to more closely reflect the guidance from the CalEEMod User's Guide and at a minimum the most recent edition of the ITE Report. Further, the project should include ongoing monitoring to ensure that the trip rate (and subsequent emissions) do not exceed what has been analyzed in the Final EIR.

The AQMD staff is available to work with the Lead Agency to address these issues and any other air quality questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,



Ian MacMillan
Program Supervisor, Inter-Governmental Review
Planning, Rule Development & Area Sources

IM:GM

RVC121031-01
Control Number